

**IN THE UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF OHIO  
DAYTON DIVISION**

**IN RE:**

**CASE NO. 15-32242**

**JEFFREY S. ROSE  
STEPHANIE L. ROSE**

**CHAPTER 13**

**JUDGE GUY R. HUMPHREY**

**Debtors**

**RESPONSE BY CREDITOR TO MOTION TO COMPEL [D.E. 87]**

Comes now, U.S. Bank National Association, not individually but solely as Trustee for BlueWater Investment Trust 2018-1 (“Secured Creditor”), by and through the undersigned counsel, and files this written response to Motion To Compel [D.E. 87], and as grounds therefore states:

1. U.S. Bank National Association, not individually but solely as Trustee for BlueWater Investment Trust 2018-1 is a secured creditor holding a secured claim against the Debtor’s real property, located at 10298 Greenbush Road, Camden, OH 45311.
2. On February 18, 2021, the Debtor filed a Motion to Compel [D.E. 87].
3. Secured Creditor is in the process of reviewing its records in order to respond to the allegations in this instant Motion and requests additional time to do so.
4. Secured Creditor reserves the right to supplement its response.

WHEREFORE, PREMISES CONSIDERED, Movant prays that this Court deny the Motion to Compel [D.E. 87] and that the Court grant such other and further relief as is proper and just.

DATED this 10<sup>th</sup> day of March, 2021.

Respectfully submitted,

/S/ Seth Greenhill

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**SERVICE LIST (CASE NO. 15-32242)**

VIA US FIRST CLASS MAIL:

Debtor  
Jeffrey S Rose  
10298 Greenbush Rd  
Camden, OH 45311

Joint Debtor  
Stephanie L Rose  
10298 Greenbush Rd  
Camden, OH 45311

VIA ECF:

Attorney for Debtors  
Michael G Weller  
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Centerville, OH 45459-3725

Trustee  
John G. Jansing  
Chapter 13 Trustee  
131 North Ludlow St, Suite 900  
Dayton, OH 45402

U.S. Trustee  
Asst US Trustee (Day)  
Office of the US Trustee  
170 North High Street  
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Columbus, OH 43215-2417